

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream TV Networks, Inc.,<sup>1</sup>

Debtor.

Chapter 11

Bky. No. 23-10763 (MDC)

In re:

Technovative Media, Inc.,

Debtor.

Chapter 11

Bky. No. 23-10764 (MDC)

(Jointly Administered)

STREAM TV NETWORKS, INC. and  
TECHNOVATIVE MEDIA, INC.,

Plaintiffs,

v.

Adv. No. 23-00057 (MDC)

SHADRON L. STASTNEY, SLS HOLDINGS  
VI, LLC, HAWK INVESTMENT HOLDINGS  
LIMITED, ARTHUR LEONARD ROBERT  
"BOB" MORTON, SEECUBIC, INC.,  
ALASTAIR CRAWFORD, KRZYSZTOF  
KABACINSKI, KEVIN GOLLOP, ASAF  
GOLA, JOHN DOE(S), JANE DOE(S),  
DELAWARE and OTHER LAW FIRMS  
representing and acting in concert with John  
Doe(s) and/or Jane Doe(s), INVESTMENT  
BANKS employed by John Doe(s) and/or Jane  
Doe(s), PATRIC THEUNE, and SEECUBIC  
B.V.,

Defendants.

Re: D.I. 56, 58, 60, 65

**STIPULATION AND [PROPOSED ORDER] REGARDING DEADLINES FOR  
RESPONSES AND REPLIES TO DEFENDANTS' MOTIONS TO DISMISS**

<sup>1</sup> The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (...4092) and Technovative Media, Inc. (...5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

Plaintiffs, Stream TV Networks, Inc. and Technovative Media, Inc. (“Debtors”) and Defendants Hawk Investment Holdings, Ltd., Arthur Leonard Robert “Bob” Morton, SeeCubic, Inc., Shadron L. Stastney and SLS Holdings VI, (“Defendants”), by and through their respective undersigned counsel, enter into this *Stipulation for Responses to Defendants’ Motions to Dismiss* (the “Stipulation”) and hereby stipulate and agree as follows:

1. On August 14, 2023, Debtors filed the above-captioned *Adversary Complaint* [D.I. 1] (the “Adversary Complaint”).

2. On August 14, 2023, a Summons was issued to SeeCubic, Inc., SLS Holdings VI, LLC and Hawk Investment Holdings, Ltd., which set the deadline of September 13, 2023 for Defendants’ to answer or respond to the Adversary Complaint. [D.I. 2]

3. On September 12, 2023, Defendant SeeCubic, Inc. and Debtors filed a first *Stipulation to Extend the Deadline to Respond to the Complaint*. [D.I. 8]

4. On September 13, 2023, Defendant SLS Holdings VI, LLC and Debtors filed a first *Stipulation to Extend the Deadline to Respond to the Complaint*. [D.I. 10]

5. On September 14, 2023, the Court granted the Stipulations to respond to the Adversary Complaint to September 20, 2023. [D.I. 11, 12]

6. On September 18, 2023, Defendant SLS Holdings VI, LLC, Shadron Statstney and SeeCubic Inc. filed a second *Motion to Extend Time to File Answer Pursuant to Rule 9006(b)(1)*. [D.I. 18] On the same day, Defendant Hawk Investment Holdings Ltd. filed its *Joinder to Defendant SLS Holdings VI, LLC, Shadron L. Statstney and SeeCubic Inc.’s Motion*. [D.I. 19]

7. On September 20, 2023, the Court entered an Order granting Defendants’ Motion to Extend Time to file Answer to Complaint to October 13, 2023. [D.I. 22]

8. On October 10, 2023, Defendant Hawk Investment Holdings Ltd. filed its *Motion to Extend Time to File an Answer Pursuant to Rule 9006(b)(1)*, seeking an extension until November 13, 2023. [D.I. 56]

9. Defendants Hawk Investment Holdings Ltd., SLS Holdings VI, LLC and Shadron L. Stastney and SeeCubic, Inc., filed their respective Joinders to the Motion to Extend Time, [D.I. 58, 60, 62]

10. On October 12, the Court entered its Order Granting Defendants' Motion to Extend Time to File and Answer Pursuant to Rule 9006(b)(1) for all Defendants to November 13, 2023. [D.I. 65]

11. On November 13, 2023, Defendants Shadron L. Stastney, SLS Holdings VI, LLC, Hawk Investment Holdings Ltd. and Arthur Leonard Robert "Bob" Morton and SeeCubic, Inc. filed their Motions to Dismiss the Adversary Complaint with Prejudice, Pursuant to F.R.C.P. 12(b)(6), 12(9)(b), and 12 (8)(a). (the "Motions to Dismiss") [D.I. 85, 89, 91, 92]

12. The Parties have conferred regarding an agreement to establish deadlines for Debtors to respond to the Motions to Dismiss and for Defendants to file a Reply, if desired.

13. The Debtors' deadline to respond to the Motions to Dismiss shall be set for December 20, 2023.

14. The deadline for Defendants to reply shall be set for January 19, 2024.

Dated: December 6, 2023

Respectfully submitted,

**LEWIS BRISBOIS  
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**IT IS SO ORDERED:**

Date 12/14/2023



The Honorable Magdelene D. Coleman  
Chief United States Bankruptcy Court